

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

**PROCEEDING NO. 19AL-\_\_\_\_\_ E**

---

**IN THE MATTER OF ADVICE LETTER NO. 781 FILED BY BLACK HILLS  
COLORADO ELECTRIC, LLC TO AMEND THE COMMUNITY SOLAR GARDEN  
(CSG) FIXED BILL CREDITS TO BECOME EFFECTIVE JANUARY 1, 2020.**

---

**MOTION FOR APPROVAL OF ALTERNATIVE FORM OF NOTICE**

---

Pursuant to C.R.S. § 40-3-104(1)(c)(I)(D) and Rule 1207(b), Black Hills Colorado Electric, LLC (“Black Hills” or “Company”), by its undersigned attorney, requests that the Commission enter an Order approving an alternative form of notice that will apply to Advice Letter No. 781-Electric. By Advice Letter No. 781-Electric, Black Hills seeks to amend its Community Solar Garden (“CSG”) Fixed Bill Credits, on Tariff Sheet No. 94I, in its Colo. P.U.C. No. 11-Electric Tariff. The CSG Fixed Bill Credits apply only to CSG subscribers and are used to determine the CSG subscriber’s monthly bill credit. The proposed amendments are to become effective on January 1, 2020. Black Hills also asserts that conferral is not required for this Motion according to Commission Rule 1400(a)(I), and that responses to this Motion are not allowed according to Commission Rule 1207(b). In support of the relief requested, Black Hills states as follows:

1. On November 15, 2019, the Company filed Advice Letter No. 781-Electric to amend its CSG Fixed Bill Credits on Tariff Sheet No. 94I, in its Colo. P.U.C. No. 11-Electric Tariff. The proposed tariff amendments vary by customer class and have no effect on the Company’s revenues. The proposed amendments will increase the bill credit for Regular Residential, Large Power Service Primary, and Irrigation; and, decrease the bill credit for all

other customer classes, namely Other Residential, Non-Demand Small General Service, Demand Small General Service, Primary Large General Service, Secondary Large General Service, Secondary Large Power Service, and Transmission Large Power Service.

2. This Motion only pertains to a request for alternative form of notice for the Company's amendments to its Tariff to reflect the CSG Fixed Bill Credits revisions. However, the Company will be filing a separate Advice Letter filing to amend its Energy Payment Rate ("Avoided Cost Rate") (due no later than November 30). Given the Company's requirement during the month of November to amend the CSG Fixed Bill Credits and Avoided Cost Rate, the Company is seeking approval in this Motion to provide alternative notice that reflects the filings of these two adjustments.<sup>1</sup>

3. Specifically, Black Hills seeks Commission authorization to use the following form of alternative notice for its amendments to its CSG Fixed Bill Credits:

- a. Filing with the Commission, and keeping open for inspection, Advice Letter No. 781-Electric, which amends its CSG Fixed Bill Credits, on Tariff Sheet No. 94I, in its Colo. P.U.C. No. 11-Electric Tariff.
- b. Posting on the website for Black Hills its Advice Letter No. 781-Electric and the accompanying tariff sheet, for forty-five (45) days beginning within one week after the filing of Advice Letter No. 781-Electric. In addition, Black Hills will post on its website the Customer Notice attached herewith as Attachment 1 – Placeholder Customer Notice ("Customer Notice"). The Customer Notice includes amendments and impacts of the CSG Fixed Bill Credits and Avoided Cost Rate filings made in

---

<sup>1</sup> This Motion only seeks Commission approval of alternative form of notice for its amendments to its CSG Fixed Bill Credits. For clarity, Black Hills will seek separate approval of alternative form of notice for the Avoided Cost Rate filing.

November 2019, so as to provide customers with complete and comprehensive notice of the changes Black Hills is proposing to their rates. As shown in the Customer Notice, the Customer Notice will explain each adjustment and impact to applicable customers. Though Black Hills provides for Commission review the Customer Notice, it will not be posted until after the November 29, 2019 filing of the Avoided Cost Rate. Black Hills proposes to post the Customer Notice after this date so that it will provide notice to customers of all of the rate changes associated with its CSG Fixed Bill Credits and Avoided Cost Rate filings.<sup>2</sup>

- c. Printing a message on each applicable customer's bill providing the website URL for the Customer Notice, Advice Letters, accompanying tariff sheets, and a toll-free phone number for assistance, beginning with the December 2019 bill cycle, which will encompass the CSG Fixed Bill Credits filed herein and the Avoided Cost Rate amendment separately filed on November 29, 2019. Because the bill messages will begin after the filing of the Avoided Cost amendment, Black Hills will be able to provide its customers with an aggregated impact associated with the amendments to the CSG Fixed Bill Credits and Avoided Cost Rate. Given that Black Hills will not know the aggregated impact until it submits its Avoided Cost Rate filing, Black Hills provides below the bill message that will be updated with impact information in Black Hills' Avoided Cost Rate filing. The bill messages, by customer class and Rate ID, read as follows:

---

<sup>2</sup> In Attachment 1, the terms and figures highlighted in yellow will be updated and completed with the filing of Black Hills' amendment to its Avoided Cost Rate. In its Avoided Cost Rate filing, Black Hills will provide to the Commission the fully updated Customer Notice, consistent with all proposed changes to the CSG Fixed Bill Credits and Avoided Cost Rate.

**Residential – Solar and Net Metering Customers:**

“We filed to amend our CSG Fixed Bill Credits and Avoided Cost Rate to be effective January 1, 2020. These amendments have no effect on the Company’s revenues. Call (888)-890-5554 or visit [blackhillsenergy.com/filings](http://blackhillsenergy.com/filings) for more details.

**Small Commercial – Solar and Net Metering Customers:**

“We filed to amend our CSG Fixed Bill Credits and Avoided Cost Rate to be effective January 1, 2020. These amendments have no effect on the Company’s revenues. Call (888)-890-5554 or visit [blackhillsenergy.com/filings](http://blackhillsenergy.com/filings) for more details.”

**Other Customers – Solar and Net Metering Customers:**

“We filed to amend our CSG Fixed Bill Credits and Avoided Cost Rate to be effective January 1, 2020. These amendments have no effect on the Company’s revenues. Call (719)-546-6410 or (719)-554-5869 or visit [blackhillsenergy.com/filings](http://blackhillsenergy.com/filings) for more details.”

- d. Publishing a legal notice of the CSG Fixed Bill Credits and Avoided Cost Rate

Advice Letters following the Avoided Cost Rate filing on November 29, 2019 (*i.e.*, Attachment 1), with size dimensions of four columns width and 11 inches height, in three newspapers of general circulation for the service territory: (1) *The Pueblo Chieftain* (two consecutive Tuesdays, December 10 and 17); and (2) the *Cañon City Daily Record* (two consecutive Fridays, December 13 and December 20); and (3) the *Rocky Ford Daily Gazette* (two consecutive Thursdays, December 12 and December 19). Given the number of rate adjustments in November 2019 and to avoid customer confusion, the Company is requesting to consolidate the two adjustments into one Customer Notice. Consolidating the rate adjustments into one Customer Notice will

assist customers in understanding the full scope of impacts associated with the amendments to the CSG Fixed Bill Credits and Avoided Cost Rate.

4. The Company plans to go forward with this alternative form of notice. The Company would like to avoid incurring “time and materials” expense for printing customer bill inserts. In the event the Commission denies this Motion, and determines that additional notice is required, the Company will provide additional notice consistent with the Commission’s order.

5. There is good cause for the alternative form of notice requested by this Motion. A bill message, unlike a bill insert, provides more visibility to the customer because it is presented on the first page of the bill, where the customer looks for dollar amount due and the payment deadline. The website posting will provide the required information regarding the amended tariff sheets to the general public. The toll-free phone number provided in the bill message will give customers a second option to learn more about the amended tariff if they cannot access the internet for the Company’s website. The newspaper publications will provide accessible and timely notice across the Company’s entire service territory. The newspaper publications will also provide combined notice of the Company’s amendments to its CSG Fixed Bill Credits and Avoided Cost Rate, granting customers comprehensive notice of multiple adjustments that will take effect on January 1, 2020. These alternative forms of notice are expeditious and economic for the Company’s customers.

6. Wherefore, Black Hills respectfully requests that the Commission approve the alternative form of notice set forth in this Motion to amend the CSG Fixed Bill Credits inputs and rates, on Tariff Sheet Nos. 94I, in its Colo. P.U.C. No. 11-Electric Tariff.

Date: November 15, 2019

Respectfully submitted,

By: /s/ Tyler Mansholt

Tyler Mansholt, #51979

Corporate Counsel

Black Hills Corporation

1515 Wynkoop Street, Suite 500

Denver, CO 80202

Telephone: 303-566-3455

Email: [Tyler.Mansholt@blackhillscorp.com](mailto:Tyler.Mansholt@blackhillscorp.com)

Attorney for Black Hills Colorado Electric, LLC  
d/b/a Black Hills Energy